



WISCONSIN

DEPARTMENT OF WORKFORCE DEVELOPMENT
Division of Workforce Solutions
Bureau of Partner Services

TO: **Economic Support Supervisors
Economic Support Lead Workers
Training Staff
Child Care Coordinators
W-2 Agencies**

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BPS OPERATIONS MEMO

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Non W-2 ☐ W-2 ☒ CC ☐

PRIORITY: High

SUBJECT: **W-2 EDUCATION AND TRAINING POLICY ENHANCEMENTS**

CROSS REFERENCE: W-2 Manual, Chapter 7 and 8
BWSP Operations Memo 01-27

EFFECTIVE DATE: Immediately

PURPOSE

This memo provides:

1. A change in policy which allows greater flexibility on aggregating W-2 education and training hours.
2. Guidance to agencies on enhancing education and training opportunities for W-2 participants through existing programs and policies.

BACKGROUND

The W-2 program was designed to give local W-2 agencies significant flexibility in the administration of their programs. The underlying premise for this approach is the belief that W-2 will be more effective if the agency is allowed to tailor the program to the needs of the individual participants as well as the employment opportunities in the local communities. Given this basic philosophy, the Department strongly encourages innovative practices in the area of education and training.

Over the past several years, our policies and program strategies have continued to evolve in the area of education and training as we learn about new and promising practices from

the W-2 agencies, the research community and other service providers. Our hope is that agencies will use the policies and guidance offered in this memo to increase the employment opportunities for W-2 participants through innovative education and training practices.

W-2 Policy Change on Aggregating Education and Training Hours

A W-2 agency may aggregate education and training in order to allow W-2 T and CSJ participants access to short-term intensive training programs that require more than 10 or 12 hours of participation per week. During this extended education and training period, education and training hours must be mixed with some work training activity each week, as determined by the FEP.

Policy Change: The current case example in Section 8.2.1 of the W-2 manual states that under the aggregation policy, an individual can only be assigned to participate in education and training activities that can be completed during a six month period and will not exceed 258 hours. In order to make the aggregation policy more accommodating to the wide variety of training programs available, a change will be made to the W-2 manual and the case example will be revised to reflect the following:

The aggregation policy can be applied and should be considered for education and training programs that a participant can complete within a one-year period with participation in up to 516 hours of education and training activity. In addition to the education and training activities, the FEP must assign some work training activities each week, not to exceed a total of 40 hours of participation per week.

In the case comments section of the Employability Plan, the FEP must document that the aggregation policy was used, the amount of aggregated education and training hours and the expected number of weeks needed to complete the training

Wisconsin's Technical College system offers many one- and two- semester certificate programs that are accessible to W-2 participants under the aggregated education and training policy.

Example: Jennifer is found eligible for a Community Service Job. Based on an occupational assessment, she is found to be a good candidate for a short-term intensive training program. Jennifer enrolls at her local technical college in a one-semester certification program, requiring 16 credits. Lecture time and lab work requires her to attend school 26 hours per week for 16 weeks. Using the aggregation policy, the FEP assigns her to participate 26 hours per week in the technical college program. The FEP also assigns another 14 hours of work training activity for a total of 40 hours per week.

Jennifer's total aggregated education and training hours over this 16 week timeframe is 416 hours (26 hours per week x 16 weeks), keeping her well within the policy's one-year completion period and the 516 hour limit .

The goal of this policy is full-time unsubsidized employment. If the agency is unsuccessful in securing unsubsidized employment for Jennifer, her hours of participation in education and training activities are limited to the following:

- For the remainder of the year beginning with the date of her assignment to the education and training program, Jennifer cannot be assigned to more than 100 hours of education and training ($516 - 416 = 100$).

- One year following the date of her assignment to the education and training program, if Jennifer is still in a CSJ placement, 10 hours per week of education and training activity may be assigned.

Combining the Aggregated Education and Training Policy with the Prorated CSJ Policy

A prorated CSJ placement is appropriate for individuals who are already working in an unsubsidized job less than 30 hours per week and where attempts to increase the number of hours in their current job or to find additional unsubsidized employment have not succeeded due to the participant's barriers. Refer to the W-2 Manual, Section 7.3.1.4.2, for the full policy on prorated CSJs.

Individuals who are employed less than 30 hours per week and demonstrate a lack of skills that would allow them to be competitive for other available jobs or additional hours in the unsubsidized labor market are good candidates for a prorated CSJ. In certain circumstances, these individuals would also benefit from an intensive short-term training program using the aggregated education and training policy. When combining the prorated CSJ policy and the aggregated education and training policy, the FEP must keep in mind that total hours of participation, including unsubsidized employment must not exceed 40 hours per week.

Example: Geraldine works 15 hours per week washing dishes at a local restaurant. After a brief placement in W-2 CMS, the W-2 agency reassesses Geraldine's employability and determines that she is in need of additional training in order to make her competitive for full-time employment. The FEP assigns her to a half-time CSJ.

A prorated CSJ would normally require Geraldine to participate 11 to 15 hours in work training and up to 10 hours of education and training per week. But Geraldine is motivated and would like to participate in a 16-credit training program on metal casting offered through the local technical college. The training program requires Geraldine to be in the classroom and lab 20 hours per week for 16 weeks for a total of 320 hours of education and training. In addition to the training activity, the FEP assigns Geraldine to 5 hours per week of work experience. Geraldine is participating a total of 40 hours (15 hours in unsubsidized employment, 20 hours in education and training and 5 hours in work experience). She is meeting the requirements of the prorated CSJ policy while also benefiting from the aggregated education and training policy.

Using the W-2 Technical College Component

As defined in Chapter 8 of the W-2 Manual and further clarified in Operations Memo 01-27, the Technical College component is designed for a CSJ or W-2 T participant enrolled in a one to two year program provided by a technical college. Wisconsin State Statutes require that a participant placed in this component maintain full-time status in the college program, maintain a grade point average of at least 2.0 and participate in other assigned work activities for 25 hours per week.

A thorough assessment of the participant's work history, skills, interests, abilities and family circumstances will provide the background for assigning appropriate education and training activities. The Technical College component may be more appropriate for participants that have the motivation and personal support system necessary to engage in a two-year technical college program in addition to a 25-hour per week work-participation requirement. The aggregating education and training policy may be more appropriately used with participants who have barriers to completing a two-year education program or who have an interest in a training program that is short-term and work-focused.

Innovative Practices Under Workforce Attachment and Advancement (WAA) and Welfare to Work (WtW)

In addition to the education and training opportunities available through the W-2 program, the Workforce Attachment and Advancement (WAA) and Welfare-to-Work (WtW) programs also offer a broad range of education and training opportunities. Both programs allow agencies to pay for basic education, short-term skills training, and technical college courses. Each agency has the flexibility to design its own plan to operate WAA or WtW, thus the services provided may vary.

Many agencies have implemented innovative projects to increase the utilization of education and training funds through WAA. These practices include the following:

- Job retention bonus (also allowable under Community Reinvestment) – agencies may provide a one-time bonus or may provide multiple bonuses for participants who meet retention benchmarks (30 days, 90 days).
- Training completion bonus – agencies may provide a bonus to serve as an incentive to complete training.

The bonus amounts are determined by the agency, and these activities must be incorporated into their local plan. For further information on policies and activities in these programs, refer to the program web sites for policy guides and operations memos. (WAA: <http://www.dwd.state.wi.us/waa/> and WtW: <http://www.dwd.state.wi.us/wtw/>)

Workforce Investment Act

Education and training opportunities may also be available through the Workforce Investment Act (WIA). Under WIA, a number of agencies and programs are to work together to provide employment, training and education services through Job Centers. They are:

- WIA activities for Adults; Youth & Dislocated Workers
- Adult Education and Family Literacy (WTCS)
- Job Service- - Labor Exchange such as Job Net (Wagner-Peyser Title III)
- Vocational Rehabilitation
- Welfare-to-Work
- Community Service Employment for Older Americans
- Post Secondary Vocational Education
- Trade Adjustment Assistance (and NAFTA-TAA)
- Veterans E & T Services, & local veteran's outreach programs
- Community Services Block Grants
- Housing and Urban Development E & T Activities
- Unemployment Insurance
- TANF (required in Wisconsin)

National programs if present in the Workforce Development Area:

- Native American Programs
- Migrant and Seasonal Farmworker Programs
- Job Corps

Many of these programs have income-based and/or other eligibility requirements. To find out what services may be available, contact the nearest Job Center or the Workforce Development Board for your area. Locations for both are listed on the WIA website at: <http://www.dwd.state.wi.us/dwdwia/>.

In addition, WIA offers Individual Training Accounts (ITAs) to eligible participants in need of training. A person with an ITA can use the State List of Eligible Training Providers to select their own training provider in consultation with their case manager. Through ITAs, WIA encourages "Customer Choice" as a tool for empowering individuals. Information on ITAs and the State List is available at <http://www.dwd.state.wi.us/dws/ita/>.

As a Job Center partner, W-2 agencies should be working with their Workforce Development Boards to ensure that low-income families receive appropriate employment and training services.

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